

NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP

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July 6, 2017

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
Remedial Project Manager
Institutional Controls Coordinator
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree – Quarterly Progress Report 46 (April-June 2017)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from April-June 2017.

1. Actions Taken During Previous Quarter to Comply with the Consent Decree:

- **Residential Soil Remediation:** The Group's project coordinator and the Group's remedial action contractor, Environmental Works, Inc. (“EWI”), participated on May 4, 2017 with representatives of EPA and Illinois EPA in the final inspection of the residential properties at the site that were remediated in 2016. The Group's project coordinator sent an email to EPA on May 5, 2017 to confirm the results of the final inspection and document the completion of remediation and restoration activities performed in 2016. EWI continued efforts to prepare a report to document the completion of residential soil remediation activities performed at the site in 2015-2017.
- **Contingency Measures:** During a June 8, 2017 conference call, the Group learned that: (a) EPA was reviewing EWI's Visual Canvassing Report and the Group's January 2017 Contingency Measures Work Plan; and (b) EPA will provide questions and/or comments upon completion of its reviews.
- **Supplemental Environmental Project:** During the April-May 2017 period, the Group and Madison County Community Development (“MCCD”) continued to prepare a report to document the results of the supplemental environmental project (“SEP”). The Group's project coordinator sent the SEP Completion Report, which the Group prepared in consultation with MCCD, to EPA on May 12, 2017.

- **Institutional Controls:** The Group initiated efforts to update the draft Institutional Controls Work Plan. The Group also initiated efforts to prepare revised draft environmental covenants to address the new Illinois model environmental covenant that EPA provided to the Group in June 2017.
- **Operation and Maintenance:** At the request of EPA, the Group's project coordinator continued efforts in June 2017 to update the Operation and Maintenance Plan. In addition, the following operation and maintenance activities were performed at the site during the April-June 2017 period:

April 12	The Group's project coordinator spoke to Messrs. John Birdsong and Rich Werths, Granite City Sanitation Department, and notified Munie Greencare Professionals ("Munie") regarding the need to cut the vegetation on the 1555 State Street property.
April 17	The Group's project coordinator sent an email to advise Messrs. Birdsong and Werths, Granite City Sanitation Department, that Munie planned to cut the vegetation on the 1555 State Street property within the next week.
April 19	Munie cut the vegetation on the 1555 State Street property.
April 20	Munie applied herbicide to control the growth of vegetation on and around the fence on the 1555 State Street property.
April 26	The Group's project coordinator notified representatives of Beelman Trucking that an operation and maintenance inspection would be performed at Slough Road on May 3, 2017.
May 3	The Group's project coordinator performed a semi-annual operation and maintenance inspection at the site.
May 8	The Group's project coordinator sent an email to the operator of All Pallet Service to request that All Pallet Service collect trash, debris, etc. and repair bent sections of fence from the area around the perimeter of the Taracorp pile property. The operator of All Pallet Service acknowledged that the work would be performed.
May 9	The Group's project coordinator sent an email and letter to EPA to provide log sheets and photographs documenting the results of the semi-annual operation and maintenance inspection performed at the site on May 3, 2017.
May 23	The Group's project coordinator sent a copy of the operation and maintenance inspection report to Beelman Trucking, at the request of Beelman Trucking, to document the results of the May 3, 2017 operation and maintenance inspection at Slough Road.
June 21	Munie cut the vegetation on the 1555 State Street property, Taracorp pile, and surrounding areas.

- **Project Coordination:** During the April-June 2017 period, the Group's project coordinator communicated with the following parties regarding work at the site:

April 3	Coordinated efforts with EPA, Illinois EPA, and EWI regarding the schedule for the final inspection of the residential properties remediated at the site in 2016.
April 10	Submitted Quarterly Progress Report 45 to EPA.

April 17	Sent an email to EPA's project manager regarding the schedule for the site visit to perform a final inspection of the residential properties where soil excavation and restoration activities were completed in 2016.
April 26	Sent letters to the owners of 17 residential properties that were remediated in 2016 to notify the property owners that the Group and EWI planned to perform a final inspection on their properties with EPA and Illinois EPA on May 4, 2017.
April 26	Sent an email to EPA and Illinois EPA to provide copies of the letters sent to the owners of 17 remediated residential properties regarding the schedule for the final inspection.
May 2	Communicated with EPA regarding the schedule for the May 4, 2017 site visit.
May 4	Participated with representatives of EPA, Illinois EPA, and EWI in the final inspection of the residential properties at the site that were remediated in 2016.
May 5	Sent an email to EPA to document the results of the May 4, 2017 final inspection and the completion of remediation and restoration activities performed in 2016.
May 12	Sent the SEP Completion Report, which the Group prepared in consultation with MCCD, to EPA.
May 22	In response to a request from EPA's project manager, sent an excerpt to EPA from the Group's SEP contract with MCCD.
June 6	Received an inquiry from a consultant regarding a Phase 1 environmental site assessment being performed for the 1409 State Street property, an industrial property located to the south of the main industrial site.
June 8	Participated in a conference call with Group representatives and EPA and discussed various items related to contingency measures, the SEP, institutional controls, and others.
June 14	Sent a memorandum to respond to the inquiry from the consultant performing the Phase 1 environmental site assessment for the industrial property at 1409 State Street.
June 15	In response to a request from EPA's project manager, sent an email to EPA to provide the draft environmental covenant (from 2014) for the U.S. Carriers Inc. property at Slough Road.
June 15	Received an email from EPA's project manager that included an updated version of the Illinois model for environmental covenants.
June 21	Responded to an inquiry from a local resident who requested contact information for Taracorp.
June 26	Confirmed with the operator of All Pallet Service that trash had been collected, and the bent sections of fence would be repaired, to address the results of the May 2017 operation and maintenance inspection.

2. **Summary of Data and/or Results of Sampling and Tests Received:**

- As indicated above, EWI continued efforts during the April-June 2017 period to document the results of residential soil remediation activities performed at the site from 2015 to 2017. The report, which will be submitted to EPA upon completion, will include data collected by EWI in conjunction with remedial activities.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- As indicated above, the Group submitted the SEP Completion Report to EPA on May 12, 2017.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will continue to perform operation and maintenance activities at the site, as required. The Group's lawn maintenance contractor, Munie, will cut the vegetation on the 1555 State Street property and Taracorp pile, as necessary.
- The Group's project coordinator will continue to update the Operation and Maintenance Plan.
- The Group and EWI will continue efforts to prepare a report to document the completion of residential soil remediation activities at the site in 2015-2017. At the present time, the Group anticipates that the report will be finalized and submitted to EPA in July-August 2017.
- The Group will address comments or questions from EPA, if any are received, on the Visual Canvassing Report and the Contingency Measures Work Plan, which were submitted to EPA in January 2017.
- The Group will address comments, if any are received from EPA, on the Institutional Controls Work Plan. The Group will prepare an updated version of the Institutional Controls Work Plan. In addition, the Group will continue to prepare revised draft environmental covenants based upon the new Illinois model provided by EPA in June 2017.
- The Group will address comments, if any are received from EPA, on the SEP Completion Report.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA on August 11, 2014 to summarize the results of the April 2014 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April – May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties Non-Responsive Non-Responsive in June 2015 and one residential property Non-Responsive in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to

document the results of soil sampling activities performed on three residential properties
Non-Responsive in August 2016.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- Not applicable for this reporting period.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.


Jeffrey A. Leed
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Ms. Erin Rednour - Illinois EPA (by electronic mail and first class mail)
Mr. Tom Miller – Illinois EPA (by electronic mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)